

MICHAEL R. HOGUE, ESQ.
Nevada Bar No. 12400
ELLIOT T. ANDERSON, ESQ.
Nevada Bar No. 14025
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Fax: (702) 792-9002
Email: hoguem@gtlaw.com
andersonel@gtlaw.com

*Counsel for Defendant
CITIMORTGAGE, INC.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NATIONAL DEFAULT SERVICING
CORPORATION,

Plaintiff,

v.

JOANNE T. ORLANDO, an unmarried woman;
CITIMORTGAGE, INC., a foreign corporation;
INTERNAL REVENUE SERVICE, a
Government Agency; and DOES 1 through 10
and ROE BUSINESS ENTITIES 1 through 10,
inclusive,

Defendants.

Case No. 2:24-cv-01339-JCM-BNW

**STIPULATION TO EXTEND DATE
FOR DEFENDANT CITIMORTGAGE,
INC. TO RESPOND TO COMPLAINT
IN INTERPLEADER**

(First Request)

COME NOW, Defendant CITIMORTGAGE, INC. (“Defendant”), by and through its attorneys, the law firm of Greenberg Traurig, LLP and Plaintiff NATIONAL DEFAULT SERVICING CORPORATION (“NDSC”) (collectively, the “Parties”), by the through its attorneys of record, the law firm of Tiffany & Bosco, PA, and hereby stipulate and agree that Defendant will have up to and including August 20, 2024, in which to respond to the Complaint in Interpleader (“Complaint”). Via Counsel, Defendant accepted service of the Summons and Complaint on July 23, 2024, and its response is currently due August 13, 2024. A short extension of seven (7) days is being requested due to circumstances relating to counsel’s background investigation of the allegations

1 contained in the Complaint. As extended, Defendant would have up to and including August 20,
2 2024, to file an Answer.

3 Therefore, it is respectfully requested that Defendant be allowed up to and including August
4 20, 2024, to respond to the Complaint.

5 This is the Parties' first stipulation for an extension of time, and the Stipulation is not made
6 for purposes of delay.

7 DATED this 13th day of August, 2024.

DATED this 13th day of August, 2024.

8 **GREENBERG TRAURIG, LLP**

TIFFANY & BOSCO, PA

9
10
11 /s/ Elliot T. Anderson

/s/ Krista J. Nielson

12 MICHAEL R. HOGUE, ESQ.

KRISTA J. NIELSON, ESQ.

13 Nevada Bar No. 12400

Nevada Bar No. 10698

ELLIOT T. ANDERSON, ESQ.

10100 West Charleston Boulevard, Suite 220

14 Nevada Bar No. 14025

Las Vegas, Nevada 89074

10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

Counsel for Plaintiff

15 *Counsel for Defendant*

16 *CITIMORTGAGE, INC.*

17
18 **IT IS SO ORDERED.**

19 
20 **UNITED STATES MAGISTRATE JUDGE**

21 **DATED:** 8/15/2024

From: [Krista J. Nielson](#)
To: [Anderson, Elliot \(Assoc-LV-LT\)](#); [Nicole Lane](#)
Cc: [Stacey Grata](#); [Bundick, Jacob \(Shld-LV-LT\)](#); [Hogue, Michael \(Shld-LV-LT\)](#); [Flintz, Andrea \(LSS-LV-LT\)](#)
Subject: Re: National Default Servicing Corporation v. Joanne Orlando, et al.; 2:24-cv-1339; TB #23-72662 FOR REVIEW: Stipulation and Order
Date: Tuesday, August 13, 2024 9:06:59 AM
Attachments: [image002.png](#)
[image001.png](#)

You may affix my signature. Thanks.

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From: andersonel@gtlaw.com <andersonel@gtlaw.com>
Sent: Monday, August 12, 2024 8:12:07 PM
To: Nicole Lane <Nlane@tblaw.com>
Cc: Krista J. Nielson <knielson@tblaw.com>; Stacey Grata <SGrata@tblaw.com>; bundickj@gtlaw.com <bundickj@gtlaw.com>; hoguem@gtlaw.com <hoguem@gtlaw.com>; flintza@gtlaw.com <flintza@gtlaw.com>
Subject: RE: National Default Servicing Corporation v. Joanne Orlando, et al.; 2:24-cv-1339; TB #23-72662 FOR REVIEW: Stipulation and Order

Krista,

Attached hereto, please see the draft stipulation and order. If this draft meets with your approval, please let us know if we may affix your e-signature to the same. Otherwise, if you have any comments or revisions, do also please let us know.

Thanks,

Elliot Anderson
Associate

Greenberg Traurig, LLP
Suite 600 | 10845 Griffith Peak Drive | Las Vegas, Nevada 89135
T +1 702.792.3773 C +1 702.827.9068
andersonel@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



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From: Anderson, Elliot (Assoc-LV-LT)